

DANIEL G. SWANSON, SBN 116556  
dswanson@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071  
Telephone: 213.229.7000  
Facsimile: 213.229.7520

CYNTHIA E. RICHMAN (D.C. Bar No.  
492089; *pro hac vice*)  
crichman@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036  
Telephone: 202.955.8500  
Facsimile: 202.467.0539

JULIAN W. KLEINBRODT, SBN 302085  
jkleinbrodt@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
One Embarcadero Center, Suite 2600  
San Francisco, CA 94111  
Telephone: 415.393.8200  
Facsimile: 415.393.8306

MARK A. PERRY, SBN 212532  
mark.perry@weil.com  
JOSHUA M. WESNESKI (D.C. Bar No.  
1500231; *pro hac vice*)  
joshua.wesneski@weil.com  
WEIL, GOTSHAL & MANGES LLP  
2001 M Street NW, Suite 600  
Washington, DC 20036  
Telephone: 202.682.7000  
Facsimile: 202.857.0940

MORGAN D. MACBRIDE, SBN 301248  
morgan.macbride@weil.com  
WEIL, GOTSHAL & MANGES LLP  
Redwood Shores Pkwy, 4th Floor  
Redwood Shores, CA 94065  
Telephone: 650.802.3044  
Facsimile: 650.802.3100

Attorneys for Defendant APPLE INC.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

EPIC GAMES, INC.

Plaintiff, Counter-defendant  
v.

APPLE INC.,

Defendant, Counterclaimant

Case No. 4:20-cv-05640-YGR-TSH

**EXHIBIT A (REDACTED) TO  
DECLARATION OF MARK A. PERRY IN  
SUPPORT OF APPLE INC.'S STATEMENT  
IN SUPPORT OF ADMINISTRATIVE  
MOTION TO SEAL**

The Honorable Thomas S. Hixson

# **EXHIBIT A**

## **(Redacted)**

Bates Number of Parent Document (Folder Title)	Number	Production Beginning Bates	Production End Bates	Custodians	DocDate	DocTime	From	To	Cc	Bcc	Subject	OriginalName	Redact or Withhold	PrivilegeType	Privilege Description	Additional Privilege Context	Attorneys, Legal Staff, and Employees acting at the direction of counsel	Special Master Determinations (Priv - Yes; Priv - No)	Optional Special Master Notes
PRIV-APL-EG_00187070	3595	PRIV-APL-EG_00187074	PRIV-APL-EG_00187085	Goldberg, Marni								101421 Litigation Summit Deck.key	Withhold	AttorneyClient	Draft document reflecting legal advice from counsel regarding injunction compliance press and communications legal strategy	Draft presentation includes information regarding litigation currently pending against Apple, and it appears to have been drafted with the assistance of outside counsel. Presentation includes notes that appear to be from attorneys	Kate Adams (Apple in-house counsel); Kyle Andeer (Apple in-house counsel); Sean Cameron (Apple in-house counsel); Sean Dillon (Apple in-house counsel)	No	
PRIV-APL-EG_00187811	3679	PRIV-APL-EG_00187811	PRIV-APL-EG_00187812	Goldberg, Marni	2023-03-02	16:22:26	Marni Goldberg	Fred Sainz	Hannah Smith		Re: Epic TPs and our answer to Craig's statement on iMessage and locking in	20230302-0822 Re: Epic TPs and our answer to Craig's statement on iMessage.eml	Redact	AttorneyClient	Email chain with redacted text providing information for the purpose of obtaining legal advice from counsel regarding injunction compliance press and communications legal strategy		(outside counsel)	No	
PRIV-APL-EG_00187811	3680	PRIV-APL-EG_00187813	PRIV-APL-EG_00187815	Goldberg, Marni								PR Fact Sheet - Response to Epic's Argument that Apple Locks In Consumers_104545277_2.pages	Withhold	AttorneyClient	Document providing information for the purpose of obtaining legal advice from counsel regarding injunction compliance press and communications legal strategy		Attachment is attorney client communications from court proceedings, and cover email indicates that attachment was made with input from legal team.	No	
PRIV-APL-EG_00188024	3709	PRIV-APL-EG_00188024	PRIV-APL-EG_00188028	Goldberg, Marni	2022-12-19	19:23:46	Emma Wilson				Fwd: ACM	20221219-1131 Fwd: ACM.eml	withhold	AttorneyClient	Email chain reflecting legal advice from counsel regarding foreign regulatory issues in the Netherlands for dating apps	lawyer updating the client about the case in Netherland	Update from Legal, shared by Emma Wilson at Legal's direction	No	
PRIV-APL-EG_00188162	3734	PRIV-APL-EG_00188162	PRIV-APL-EG_00188164	Goldberg, Marni	2021-11-12	13:38:45	Fred Sainz	Marni Goldberg			Re: Politico Brussels on CAF South Korea conference	20211112-0538 Re: Politico Brussels on CAF South Korea conference.eml	Withhold	AttorneyClient	Email chain providing legal advice from counsel regarding foreign regulatory issues press and communications legal strategy		Document includes content that Apple legal weighed in on	No	